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February 13, 2023

**VIA ECF**

Hon. Ronnie Abrams  
U.S. District Judge  
Southern District of New York  
40 Foley Square  
Courtroom 1506  
New York, NY 10007

Application granted.

SO ORDERED.

  
\_\_\_\_\_  
Ronnie Abrams, U.S.D.J.  
February 13, 2023

**Re: *United States v. Zishe Abraham, 20-CR-411 (RA)***

Dear Judge Abrams:

We represent defendant Zishe Abraham in the above-referenced matter. We write to respectfully request temporary modification of Mr. Abraham's conditions of pretrial release to permit him to travel as follows:

- (1) From February 14, 2023 through February 15, 2023, Mr. Abraham requests permission to travel to Montreal, Canada with his wife for his nephew's bar mitzvah.
- (2) From February 15, 2023 through February 19, 2023, Mr. Abraham requests permission to travel to Oxnard, California on a family trip with his wife.

Because Mr. Abraham requests permission to travel internationally, prior to his travel, he will provide Pretrial Services his children's travel documents, including his older child's passport, birth certificate, and social security card, and his younger child's birth certificate, and social security card (Mr. Abraham's younger child does not have a passport).

We have conferred with Pretrial Services (Officer Barrios), who takes no position and defers to the government on these requests. We have further conferred with the government (AUSA Kamal) who consents to this request, provided Mr. Abraham deposits his children's travel documents with Pretrial Services prior to his travel.

Respectfully submitted,

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/s/ IH  
Henry E. Mazurek  
Ilana Haramati  
*Counsel for Defendant Zishe Abraham*